

**P O R T E R | S C O T T**

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Attorneys for Defendants COUNTY OF SACRAMENTO and SACRAMENTO COUNTY  
SHERIFF'S DEPARTMENT

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

CANNON HUGH DANIELS, deceased;  
decedent's wife, ARIELE ROSTAMO aka  
ARIELE NELSON; decedent's mother,  
SUSAN ADELL DANIELS; and decedent's  
father, JOSEPH ALBERT DANIELS, IV,  
individually,

Plaintiff,

v.

COUNTY OF BUTTE; BUTTE COUNTY  
SHERIFF'S DEPARTMENT; KORY L.  
HONEA, individually and in his official  
capacity as Butte County Sheriff; COUNTY  
OF SACRAMENTO; SACRAMENTO  
COUNTY SHERIFF'S DEPARTMENT;  
SCOTT R. JONES, individually and in his  
official capacity as Sacramento County  
Sheriff; OROVILLE HOSPITAL;  
WELLPATH MANAGEMENT, INC.;  
SACRAMENTO COUNTY DEPARTMENT  
of HEALTH SERVICES; and DOES I to 50,  
Inclusive,

Defendants.

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CASE NO. 2:20-cv-00445 JAM EFB

**AMENDED STIPULATION FOR DISMISSAL  
WITH PREJUDICE OF DEFENDANTS  
SCOTT R. JONES AND SACRAMENTO  
COUNTY DEPARTMENT OF HEALTH  
SERVICES AND ORDER**

Complaint Filed: 02/26/2020

1 IT IS HEREBY STIPULATED and agreed by and between Plaintiffs and Defendants COUNTY  
2 OF SACRAMENTO; SACRAMENTO SHERIFF'S DEPARTMENT that Defendants SCOTT R.  
3 JONES and SACRAMENTO COUNTY DEPARTMENT OF HEALTH SERVICES be dismissed from  
4 this action in their entirety with prejudice pursuant to Fed. R. Civ. P. 41(a).

5 IT IS FURTHER STIPULATED and agreed that in exchange for said dismissals, Defendant  
6 COUNTY OF SACRAMENTO; SACRAMENTO SHERIFF'S DEPARTMENT shall make available  
7 and produce SCOTT R. JONES and any employees, officers, or agents of SACRAMENTO COUNTY  
8 DEPARTMENT OF HEALTH SERVICES involved with the deceased or with the management and/or  
9 control of the deceased while he was incarcerated in the Sacramento jail for his/her deposition(s) and/or  
10 at trial, if necessary, without the requirement of Plaintiff formally serving him/her by deposition and/or  
11 trial subpoena.

12 IT IS FURTHER STIPULATED that each party is to bear their own fees and costs, including all  
13 attorneys' fees as to these dismissed Defendant's only.

14  
15 **IT IS SO STIPULATED.**

16  
17 Dated: September 3, 2020

PORTER SCOTT  
A PROFESSIONAL CORPORATION

18  
19 By /s/ David R. Norton  
20 Carl L. Fessenden  
21 David R. Norton  
22 Attorneys for Defendants COUNTY OF  
23 SACRAMENTO, SACRAMENTO  
24 COUNTY SHERIFF'S DEPARTMENT;  
SCOTT R. JONES, SACRAMENTO  
COUNTY DEPARTMENT OF HEALTH  
SERVICES

25  
26 Dated: September 3, 2020

ANDREW E. BAKOS & ASSOCIATES, P.C.

27 By /s/ Andrew E. Bakos (as authorized on 9/3/20)  
28 Andrew E. Bakos  
Attorney for Plaintiffs

**ORDER**

Having reviewed the Stipulation of the parties, and good cause appearing, IT IS HEREBY ORDERED that the above-captioned action is dismissed with prejudice as to Defendants SCOTT R. JONES and SACRAMENTO COUNTY DEPARTMENT OF HEALTH SERVICES, the named Defendants identified in the Stipulation. Each party is to bear their own fees and costs, including all attorneys' fees as to these dismissed defendants only.

Dated: September 3, 2020

/s/ John A. Mendez  
The Honorable John A. Mendez  
United States District Court Judge